

## REMARKS

Independent claim 1 was rejected under 35 U.S.C. § 102(e) as being anticipated by Yao.

As amended, claim 1 calls for soaking a substrate having a dielectric deposited thereon in a salt solution, the dielectric having a first dielectric constant, and depositing an oxide on the dielectric, the oxide having a second dielectric constant that is different from the first dielectric constant.

It is respectfully submitted that Yao fails to specifically disclose depositing an oxide on a dielectric, the oxide and dielectric having different dielectric constants. For example, in Yao the substrate material is either a metal, ceramic, or an organic polymer. *See* column 7, lines 4-10. However, Yao fails to specifically disclose forming a precipitate on a dielectric. As such, claim 1 is distinguished over Yao.

Under a similar analysis, independent claim 11 as amended is also believed to be distinguished over Yao.

Independent claim 21 was also rejected under 35 U.S.C. § 102(e) as being anticipated by Yao.

Claim 21 as amended calls for depositing a dielectric on a substrate using a first method of deposition, and depositing an oxide on the dielectric by immersing the substrate in a salt solution, the deposition by immersing different from the first method of deposition.

Yao fails to specifically disclose depositing a dielectric on a substrate using a first method of deposition and then forming a metal oxide precipitate on the deposited dielectric. In other words, as explained above, Yao fails to specifically disclose forming a metal oxide precipitate on a dielectric material. As such, claim 21 is also believed to be distinguished over Yao.

With respect to the rejection of claims 2, 3, and 4, it is unclear from the Office action where in Yao aluminum *chloride* is disclosed as a fluoride ion capturing agent. In particular, Yao's list of homogeneous and heterogeneous fluoride capturing agents fails to specifically include aluminum chloride. *See* column 6, lines 11-45. Because Yao fails

to specifically disclose aluminum chloride as a fluoride ion capturing agent, it is unclear how aluminum oxide is deposited in the manner described in the Office action.

Likewise, it is not readily apparent where chloride is derived in Yao's examples 3 and 4, or in the outline presented in column 7, lines 10-31. Also, Yao fails to specifically disclose aluminum oxide alone as a metal oxide precipitate. That is, only zirconium oxide and/or hafnium oxide are disclosed by Yao as being a main component of a precipitate. That is, the precipitate may include a *small* amount of an oxide of an alkaline earth metal, transition metal, or a III A group metal. *See* column 3, line 64-column 4, line 9. Further, the primary precipitates formed in Yao all are derived from a metal fluoro complex compound or a metal fluoride of a metal. *See* column 4, lines 33-52. As such, it is respectfully submitted that Yao fails to specifically teach or suggest a method for depositing aluminum oxide as the primary material of a layer or portion thereof. Taken together, it is respectfully submitted that claims 2, 3, and 4 are independently patentable over Yao.

Under a similar analysis, dependent claims 12, 13, and 26 are each believed to be independently patentable over Yao.

New claim 32 is believed to be patentable over Yao. First, Yao fails to specifically disclose forming a precipitate on a semiconductor substrate. Second, as explained above, Yao fails to disclose forming aluminum oxide as the main oxide in a precipitate. As such, Yao does not anticipate new claim 32.

In view of the amendments and remarks herein, the application is believed to be in condition for allowance. The examiner's prompt action in accordance therewith is respectfully requested. The commissioner is authorized to charge any additional fees, including extension of time fees, or credit any overpayment to Deposit Account No. 20-1504 (ITL.1024US).

Respectfully submitted,

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